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Attorneys for Plaintiffs,  
**ELIZABETH LAVALLE,**  
and all others similarly situated

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

ELIZABETH LAVALLE, individually  
and on behalf of all others similarly  
situated,

Case No. SACV 08-01383 AHS (RNBx)

**Plaintiffs.**

vs.

CHEXSYSTEMS and DOES 1to 10,  
inclusive,

## Defendants.

**SUPPLEMENTAL DECLARATION OF JENNY  
CUDWORTH RE: MOTION FOR FINAL APPROVAL  
OF CLASS SETTLEMENT**

I, Jenny Cudworth, declare:

1. I am a Senior Consultant at Kurtzman Carson Consultants LLC ("KCC"), located at 75 Rowland Way, Suite 250, Novato, California. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. This declaration supplements the declaration I executed on September 2, 2011.

2. KCC was retained to, among other things, mail the Notice Packets, process Claim  
1  
**DECLARATION OF JENNY CUDWORTH RE: MOTION FOR FINAL APPROVAL OF CLASS  
SETTLEMENT**

1 Forms returned, and distribute checks to eligible claimants.

2       3. As of September 23, 2011, KCC received 537 Claim Forms, two of which were  
3 duplicates, resulting in 555 unique filed claims. Of the 555 unique claims, 141 are approved, 21  
4 are denied, and 373 were determined to be deficient. Notices of Deficient Claim Form with a  
5 deadline of September 16, 2011 have been mailed to the 373 whose claims were determined to be  
6 deficient. We are currently processing the responses to these Notices of Deficient Claim Form  
7 now.

8       4. Consistent with the distribution methodology that applies in this settlement, for  
9 each Valid Claim submitted, KCC will pay to the submitting Settlement Class Member eighty-  
10 two dollars (\$82.00) per Claimed Letter that Chex Systems sent to the submitting Settlement  
11 Class Member. The 141 Class Members with claims currently approved have a total of 155  
12 Claimed Letters, resulting in \$12,710.00 to be distributed. The minimum estimated amount to be  
13 distributed to the 373 Class Members who submitted a deficient Claim Form is \$34,358.00 and  
14 the maximum estimated amount to be distributed to the 373 Class Members who submitted a  
15 deficient Claim Form is \$51,332.00, resulting in a range from \$47,068.00 to \$64,042.00 to be  
16 distributed to the submitting Settlement Class Members.

17 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
18 knowledge and that this declaration was executed this 26<sup>th</sup> day of September 2011 at Novato,  
19 California.

  
Jenny Cudworth